

# **EXHIBIT P**

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF OHIO  
EASTERN DIVISION**

JAMES HAYDEN,

Plaintiff,

v.

2K GAMES, INC. et al.,

Defendants.

CASE NO. 1:17-cv-02635-CAB

JUDGE CHRISTOPHER A. BOYKO

**DEFENDANTS 2K GAMES, INC. AND  
TAKE-TWO INTERACTIVE  
SOFTWARE, INC.'S FIRST SET OF  
REQUESTS FOR PRODUCTION OF  
DOCUMENTS AND THINGS TO  
PLAINTIFF JAMES HAYDEN**

PLEASE TAKE NOTICE that, pursuant to Federal Rules of Civil Procedure 26 and 34 and the Local Rules of the United States District Court for the Northern District of Ohio, Defendants 2K Games, Inc. and Take-Two Interactive Software, Inc. (collectively, “Take-Two”), hereby request that Plaintiff James Hayden (“Hayden”) produce for examination, inspection, and copying by Take-Two, its attorneys or others acting on Take-Two’s behalf, the documents and things set forth below at the offices of Take-Two’s attorneys, Kirkland & Ellis LLP, 601 Lexington Avenue, New York, New York 10022, no later than thirty (30) days after service of these document requests (“Requests” and each a “Request”).

**DEFINITIONS**

Unless otherwise defined, all words and phrases used herein shall be accorded their usual meaning and shall be interpreted in their common, ordinary sense. As used in these Requests, the words set forth below shall be defined as follows:

1. The term “ACCUSED PRODUCTS” shall mean each, any, and all electronic games and any other material that HAYDEN asserts infringe the ASSERTED WORKS, including without limitation *NBA 2K16*, *NBA 2K17*, and *NBA 2K18*.

**REQUEST FOR PRODUCTION NO. 32:**

All COMMUNICATIONS between the NBA PLAYERS and any TATTOOIST during the period from the conception of the ASSERTED WORKS to present.

**REQUEST FOR PRODUCTION NO. 33:**

All DOCUMENTS CONCERNING COMMUNICATIONS with any NBA PLAYERS REFERRING OR RELATING TO tattoos, including without limitation the ASSERTED WORKS.

**REQUEST FOR PRODUCTION NO. 34:**

All DOCUMENTS CONCERNING COMMUNICATIONS with any NBA PLAYERS REFERRING OR RELATING TO intellectual property rights.

**REQUEST FOR PRODUCTION NO. 35:**

All DOCUMENTS CONCERNING COMMUNICATIONS with any NBA PLAYERS REFERRING OR RELATING TO licensing intellectual property rights.

**REQUEST FOR PRODUCTION NO. 36:**

All DOCUMENTS CONCERNING the NBA PLAYERS' use or commercialization of the ASSERTED WORKS.

**REQUEST FOR PRODUCTION NO. 37:**

All DOCUMENTS CONCERNING images of the NBA PLAYERS' depicting the ASSERTED WORKS.

**REQUEST FOR PRODUCTION NO. 38:**

All DOCUMENTS CONCERNING statements made by the NBA PLAYERS CONCERNING their tattoos.

Dated: May 1, 2019



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Take-Two Interactive Software, Inc.*